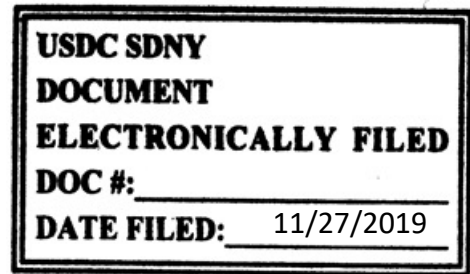


brownrudnick

DYLAN P. KLETTER
dkletter@brownrudnick.com

November 27, 2019



VIA ECF

Hon. Katharine H. Parker, U.S.M.J.
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street, Room 750
New York, New York 10007

RE: *Veerappan Subramanian v. Lupin, Inc.*
Civ. Action No. 17-5040-RA-KH_

Dear Judge Parker:

Pursuant to your Honor's Rules, Defendant and Counterclaim Plaintiff Lupin, Inc. ("Lupin") requests that the Court accept under seal Lupin's response to the Sellers' November 22, 2019 letter motion to compel, dated November 27, 2019 (the "Opposition Letter").

The Opposition Letter makes reference to certain confidential information with respect to the Euticals Action, which has been redacted from the publicly filed version of the Opposition Letter. Likewise, the Opposition Letter makes reference to certain testimony of Mary Furlong, which has been designated Confidential and has been redacted from the publicly filed version of the Opposition Letter. The information redacted from the Opposition Letter is of a kind that has not been historically open to the press and the general public, and, thus, should be filed under seal in accordance with the experience and logic test. *See Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132 (2d Cir. 2016).

In accordance with your Honor's rules, Lupin has submitted the Opposition Letter and the proposed redactions by email.

Respectfully,

BROWN RUDNICK LLP

/s/ Dylan P. Kletter
Dylan P. Kletter

11/27/2019

SO ORDERED:

A handwritten signature in black ink that reads "Katharine H. Parker".
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE